

REMARKS

Claims 16-30 are pending in the application. In the non-final Office Action dated July 23, 2007, the Examiner made the following disposition:

- A.) Objected to the specification.
- B.) Rejected claims 24-27 and 30 under 35 U.S.C. §101.
- C.) Rejected claims 16-18, 20-22, and 24-26 under 35 U.S.C. §103(a) as being unpatentable over *Meyer (U.S. 2001/0037417)* in view of *Kays, et al. (U.S. 6,751,799)* (“*Kays*”).
- D.) Rejected claims 16-18, 20-22, 24-26, and 28-30 under 35 U.S.C. §103(a) as being unpatentable over *Nevarez, et al. (U.S. 6,609,158)* (“*Nevarez*”) in view of *Kays*.
- E.) Rejected claims 19, 23, and 27 under 35 U.S.C. §103(a) as being unpatentable over *Nevarez* in view of *Kays* and further in view of *Drapeau, “Project Blackwood: Integration of the Java Platform with Mozilla”* (“*Drapeau*”).

Applicant respectfully traverses the rejections and addresses the Examiner’s disposition below:

A.) Objection to the specification:

Claims 24-27 and 30 have been amended as per the Examiner’s request to overcome the objection.

Applicant respectfully submits the objection has been overcome and requests that it be withdrawn.

B.) Rejection of claims 24-27 and 30 under 35 U.S.C. §101:

Claims 24-27 and 30 have been amended as per the Examiner’s request to overcome the rejection.

Applicant respectfully submits the rejection has been overcome and requests that it be withdrawn.

C.) Rejection of claims 16-18, 20-22, and 24-26 under 35 U.S.C. §103(a) as being unpatentable over *Meyer (U.S. 2001/0037417)* in view of *Kays, et al. (U.S. 6,751,799)* (“*Kays*”):

Applicant respectfully disagrees with the rejection.

Independent claims 16, 20, and 24 each claim subject matter relating to remote inter-language method calling. A connect module receives a method call from a proxy object using an intermediary protocol. The method call is translated from a first protocol to the intermediary protocol by the proxy object. The connect module translates the method call from the intermediary protocol to a second protocol. The connect module includes stub implementations for a plurality of protocols and a call parameter data structure that includes a calling stack slice for storing call parameters and return values. (See, e.g., Figure 4, specification 8:24-9:6). The connect module issues the method call to a method using said second protocol.

This is clearly unlike *Meyer* in view of *Kays*, which fails to disclose or suggest a connect module that includes a call parameter data structure that includes a calling stack slice for storing call parameters and return values. The Examiner acknowledges that *Meyer* fails to teach this claimed call parameter data structure. *Office Action of 7/23/07*, page 6. Applicant respectfully submits that *Kays* also fails to disclose or suggest Applicant's claimed call parameter data structure.

The Examiner cites to *Kays* 5:15-22; and 7:3-12 as alleged support for the Examiner's argument that *Kays* teaches or suggests Applicant's claimed call parameter data structure. However, none of the cited passages describe a data structure that includes a calling stack slice that has both call parameters and return values. In fact, nowhere does *Kays* mention or suggest a calling stack slice. Instead, *Kays* 5:15-22 merely describes that *Kays*' server receives a remote procedure call, interprets the call, and then forwards it to a server procedure. *Kays* 7:3-12 addresses different subject matter than *Kays* 5:15-22 and describes *Kays*' server returns a processing result to a client. Neither of these cited passages describe a call parameter data structure that includes a calling stack slice. This is simply not addressed by *Kays*, let alone a calling stack slice that includes both call parameters and return values.

Therefore, *Meyer* in view of *Kays* fails to disclose or suggest claims 16, 20, and 24.

Claims 17, 18, 21, 22, 25, and 26 depend directly or indirectly from claims 16, 20, and 24 and are therefore allowable for at least the same reasons that claims 16, 20, and 24 are allowable.

Applicant respectfully submits the rejection has been overcome and requests that it be withdrawn.

D.) Rejection of claims 16-18, 20-22, 24-26, and 28-30 under 35 U.S.C. §103(a) as being unpatentable over *Nevarez, et al. (U.S. 6,609,158)*(“*Nevarez*”) in vie of *Kays*:

Applicant respectfully disagrees with the rejection.

Independent claims 16, 20, and 24 each claim subject matter relating to remote inter-language method calling. A connect module receives a method call from a proxy object using an intermediary protocol. The method call is translated from a first protocol to the intermediary protocol by the proxy object. The connect module translates the method call from the intermediary protocol to a second protocol. The connect module includes stub implementations for a plurality of protocols and a call parameter data structure that includes a calling stack slice for storing call parameters and return values. (See, e.g., Figure 4, specification 8:24-9:6). The connect module issues the method call to a method using said second protocol.

This is clearly unlike *Nevarez* in view of *Kays*, which fails to disclose or suggest a connect module that includes a call parameter data structure that includes a calling stack slice for storing call parameters and return values. The Examiner acknowledges that *Nevarez* fails to teach this claimed call parameter data structure. *Office Action of 7/23/07*, page 9. As described above, *Kays* also fails to disclose or suggest Applicant’s claimed call parameter data structure.

Therefore, *Nevarez* in view of *Kays* fails to disclose or suggest claims 16, 20, and 24.

Claims 17, 18, 21, 22, 25, and 26 depend directly or indirectly from claims 16, 20, and 24 and are therefore allowable for at least the same reasons that claims 16, 20, and 24 are allowable.

Applicant respectfully submits the rejection has been overcome and requests that it be withdrawn.

E.) Rejection of claims 19, 23, and 27 under 35 U.S.C. §103(a) as being unpatentable over *Nevarez* in view of *Kays* and further in view of *Drapeau, “Project Blackwood: Integration of the Java Platform with Mozilla”* (“*Drapeau*”):

Applicant respectfully disagrees with the rejection.

Independent claims 16, 20, and 24 are allowable over *Nevarez* in view of *Kays* as discussed above. *Drapeau* still fails to disclose or suggest a connect module that includes a call parameter data structure that includes a calling stack slice for storing call parameters and return

values. Therefore, *Nevarez* in view of *Kays* and further in view of *Drapeau* still fails to disclose or suggest claims 16, 20, and 24.

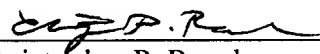
Claims 19, 23, and 27 depend directly or indirectly from claims 16, 20, and 24 and are therefore allowable for at least the same reasons that claims 16, 20, and 24 are allowable.

Applicant respectfully submits the rejection has been overcome and requests that it be withdrawn.

Conclusion

Applicant respectfully submits that claim 16-30 are allowable over the cited prior art, and respectfully requests early and favorable notification to that effect.

Respectfully submitted,

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